

VIDEO TAX NEWS

Monthly Tax Update Newsletter

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1 Government Releases

525(1)

FINANCE RELEASES

1. **April 15, 2025** – The Department of Finance issued a News Release (Canada announces **new support for Canadian businesses affected by U.S. tariffs**) that would provide:

- a performance-based **remission** framework for **automakers**;
- **6-month relief** for goods imported from the U.S. that are used in **certain Canadian industries**; and
- the **new large enterprise tariff loan facility** (LETL).

these tariff-related supports

2. **April 11, 2025** – The Department of Finance released its **annual report on federal tax expenditures**. The report provided the fiscal cost of **federal tax measures**, including a profile of claimants and beneficiaries of the **spouse or common-law partner credit** and the eligible dependant credit as well as an evaluation of initiatives supporting the **fossil fuel** sector.

CRA RELEASES

1. **April 15, 2025** – CRA released a Tax Tip (April 30th is the tax-filing deadline! Here are **last-minute tips** to cross “taxes” off your to-do-list) that provided various suggestions for filing 2024 returns. It noted that this year taxpayers **may not see** certain **tax slips**, such as the T3 (trust income), T4 (remuneration paid), T4A (pension and other income) and T5 (investment income) in **My Account** or through the **Auto-fill my Return** service **as early** as in previous years. However, CRA noted that such information can **still be manually entered** and that taxpayers should make sure that all income earned during the 2024 tax year is reported.
2. **April 14, 2025** – On the EFILE news and program updates webpage, CRA stated that they were aware of a **system issue** that is **triggering incorrect error codes** in **EFILE** and **NETFILE** certified software and is **preventing** some users from being able to **submit returns**. The error codes include 2508, 2515, 45555, 45556, 90308, 95031 and 95033.

your firm's plan for following up on slips that may have been missed

CRA noted that it is working to resolve these issues as quickly as possible and will **provide further information** and resolution dates as they become available. Affected cases will be tracked. If not resolved before the April 30th filing deadline, CRA intends to **proactively provide arrears interest and penalty relief** for individuals who file late after having received an incorrect error code that could not be resolved when attempting to file on or before their tax filing deadline.

To be eligible, the filer must have attempted to submit the return electronically on or before April 30th, received the specific error code and have been unsuccessful in resolving the error code despite taking the appropriate corrective action.

3. **April 9, 2025** – On the EFILE news and program updates webpage, CRA provided guidance on **retransmitting returns**. CRA noted that efilers can click on the “**View T1 EFILE Service Transmission History**” link to display **rejected transmissions** in reverse chronological order. Once corrected and retransmitted returns are processed, they will be removed from this list. CRA also advised efilers to use the current date when searching any of the transmission links. If there are no transmissions to display, the system will bring the user back to the EFILE login page.
4. **March 19, 2025** – **CRA's GenAI chatbot beta** website was updated to state that the chatbot is **available** to answer questions relating to **charities, personal income tax** and **accessing a CRA account**. The tool is being used to **test** the use of **generative artificial intelligence technology** in the CRA chatbot. Users should not share any personal details with the chatbot. CRA also warned that the information should

checking to make sure all returns were successfully transmitted

be used at the users' own risk. While the information provided is based upon Canada.ca webpages, it may not be fully accurate or meet the users' specific needs.

See **Appendix A** for a listing of **resources prepared by Video Tax News** that are available on the Video Tax News portal and for recently released/updated **CRA publications and forms**.

OTHER RELEASES

1. **April 4, 2025** – The Canada Border Services Agency issued a News Release (**Returning snowbirds** are reminded of **tariffs** on certain **US goods**) that noted that the **25% tariff on designated items** brought back by returning residents from the US **may apply** when their value exceeds personal exemption limits.

2. **March 22, 2025** – Employment and Social Development Canada issued a News Release (The Government of Canada introduces **new employment insurance measures** to support Canadian workers impacted by **foreign tariffs**) describing new **temporary employment insurance** (EI) measures to support workers impacted by foreign tariffs. The measures aim to **ease access** to EI benefits for Canadians facing job losses or reduced hours due to economic fallout from international trade actions. The changes include a one-point **increase to regional unemployment rates** (with a minimum rate of 7.1%) that would **increase eligibility** and **extend benefit** periods. Additional measures include **waiving the one-week waiting period** for EI and allowing workers to receive benefits without first exhausting severance or vacation pay. Details were also included in the [Canada Gazette](#).

*these new and expanded
EI benefits*

3. **March 22, 2025** – A Health Canada News Release (Canadian Dental Care Plan expands to include millions of new eligible Canadians) announced that the ability to apply for the **Canadian dental care plan** (CDCP) would be **opened in May 2025** for uninsured Canadians **aged 18 to 64**. To qualify, applicants must have an adjusted family net income under \$90,000, be Canadian residents for tax purposes, have **filed their 2024 tax returns** and not have access to any form of dental insurance.

*applications for the
remaining eligible
populations open in May
2025*

Coverage begins as early as June 1, 2025, depending on application timing. Current CDCP recipients must **reapply** starting in **March 2025** and **file their 2024 tax return by June 30** to maintain uninterrupted coverage.

*reminding those already
participating to reapply*

4. **March 18, 2025** – The Office of the Taxpayers' Ombudsperson released a **report** (Timing is Everything) which reviewed CRA's administration of the **Canada child benefit for temporary residents**. The report contained **11 suggestions** on how to improve the

application process and minimize disruptions to the continuation of benefits as immigration statuses change.

2 Personal Tax

525(2)

MEDICAL EXPENSE TAX CREDIT (METC) – FERTILITY

A January 15, 2025 **Technical Interpretation** ([2023-0983151E5](#), Chris Brennan) addressed several questions regarding METC eligibility of costs related to **assisted human reproduction**.

Costs of obtaining reproductive materials

Commencing for the 2022 tax year, amounts paid to a **fertility clinic** or **donor bank** to obtain **sperm, ova or embryos** (collectively referred to as reproductive materials) are **eligible** for the **METC** (Paragraph 118.2(2)(v); see MTU 489(6532)). While the legislation requires that the **fertility clinic** or **donor bank** be **in Canada**, that organization **could obtain** the **reproductive materials** from a source **outside Canada**. Such payments could **include administrative costs** paid to the organization.

costs must be paid to an organization in Canada to be eligible

Costs paid to foreign organizations

While **payments** to a **foreign organization** for **reproductive materials** would be **ineligible**, CRA noted that many **procedures** related to **assisted human reproduction** (for example, embryo fertilization procedures and payments to medical practitioner or to hospitals) could be **eligible for METC** under **other provisions** (for example, Paragraphs 118.2(2)(a), (n) or (o)) that are **not limited** to amounts paid to **Canadian organizations**.

a careful review of all costs incurred to identify eligible medical expenses

Administrative costs related to the receipt of **medical services** would be eligible **provided** that they were **administered** by an appropriate **medical practitioner** acting within the scope of their professional training. This would be a **question of fact**. CRA provided the example of a medical practitioner completing forms related to the medical service as an eligible administrative cost.

Medical expenses for donors or surrogates

Medical expenses incurred in Canada by a **patient** who is a **donor** of reproductive material or a **surrogate mother** are **deemed** to be **medical expenses** of the **prospective parents** (Subsection 118.2(2.21), which also became effective for the 2022 tax year). CRA opined that amounts **paid to a foreign organization** could **qualify** provided that the **medical services** were provided **within Canada**.

Payments could be made **directly** to a **fertility or donor clinic** or be **reimbursed** to a **surrogate or donor** and still be eligible provided all other criteria are met.

the person paid would not impact eligibility for the METC

CRA noted that all **costs** of obtaining **reproductive material** and **expenses paid for donors or surrogates** must meet the requirements of the **Assisted Human Reproduction Act** and related regulations. Finally, **proper receipts** would be required, as for any medical expenses, and should include the **date**, the **purpose of the payment**, the identity of the **patient** and, where applicable, the **medical practitioner** who **prescribed or provided** the purchase or service.

Another **Technical Interpretation** ([2024-1016651E5](#), Chris Brennan, CPA, CA) specifically addressed amounts paid to **obtain embryos**. CRA noted that while **payment for embryos** themselves is **illegal** in Canada, costs incurred in respect of the **maintenance and transportation** of donated embryos can be **eligible medical expenses** where all other relevant requirements are met (Paragraph 118.2(2)(v)).

3 Employment Income

525(3)

GROUP INSURANCE PLAN – TAXABLE BENEFIT

A February 19, 2025 French **Technical Interpretation** ([2018-0744821E5](#), Eric Paquin) reviewed whether a **supplemental disability insurance policy** offered only to **two executive-shareholder employees** of a corporation would be a **group insurance plan**.

whether a policy offered to only select employees can still be a group plan

CRA stated that an **insurance plan** may qualify as a **group insurance plan** if it covers **two or more people**. However, obtaining an additional disability insurance policy for just two employees does **not in and of itself** constitute a **group insurance plan**; it may simply be a contract for individual disability insurance acquired for the benefit of each of the two employees.

While the Act does not specifically define what a plan is, CRA stated that a **plan** generally means an **agreement** between an employer and its employees that provides for the **payment of benefits** to an employee who **suffers losses due to illness, maternity or accident**. A plan may include one or more insurance contracts that can be purchased from one or more insurers. An **insurance policy** is not a plan in and of itself but rather is a **component of a plan**.

whether the policy is a group plan or an individual plan for the benefit of two people

For an **individual disability policy** to be a component of a **group insurance plan**, the level of **benefits** and **contributions** by employees/employers must be **similar** to those provided to and made by **other employees** covered by the **same plan**. For example, **if** a corporation subscribed to a supplemental disability insurance policy that provided a higher **level of benefits** for an employee who was a **majority shareholder compared to other employees** in the group, the policy would **not** likely be a component of a **group insurance plan** but rather that of an individual

disability insurance policy.

A **review of the agreements** between the parties including the **insurance contracts** should be conducted to determine **whether** a particular policy constitutes a **group insurance plan**.

Employer-paid premiums to a **group sickness or accident insurance plan** are **taxable, except** to the **extent** that the **contributions** are attributable to **benefits** under the **plan** that would be **taxable** to the **individual** as the plan would provide **periodic payments** (e.g. monthly disability income replacement) in respect of the **loss of employment income** (Paragraphs 6(1)(e.1) and (f)).

if benefits are taxable to individual, employer-paid contributions are not taxable

CRA finally stated that unless indicated otherwise, an **employee-shareholder** who can **significantly influence** a corporation's **policies** is **presumed** to receive **benefits** in their **capacity as a shareholder**, resulting in a taxable shareholder benefit (Subsection 15(1)) and no corporate deduction. This presumption can be rebutted if either of the following criteria is met:

- **all employees** of the corporation are **entitled to the benefit**; or
- the **employees are all shareholders** or related to a shareholder, and the **benefit** is **comparable** to benefits generally **offered by corporations** of the **same size to non-shareholder employees** whose services and responsibilities are the same.

whether similar benefits are offered to non-shareholder employees

EXCESS SOURCE DEDUCTIONS

In a January 30, 2025 French **Court of Quebec** case ([RTI Turbo vs. QRA, 2025 QCCQ 231](#)), **two** of the four **employees** of the corporation were **not** allegedly **paid** a **salary**; however, **remittances were made** as if they continued to receive a salary. The sole shareholder made the decision not to pay himself or his spouse a salary due to liquidity issues in the corporation. Revenu Québec (RQ) **refused to provide** the taxpayer a **refund** of its **alleged excess source deductions** remitted in error. Upon appeal, the Court stated that it is **not within its jurisdiction** to decide on the taxpayer's **request** for a **refund** of overpaid source deductions. The Court noted that the request for a review of the denial should be made in a manner similar to an **application for judicial review**.

The Court also stated that **if it had jurisdiction**, it would have decided that the taxpayer was **not entitled to a reimbursement**. The taxpayer is **obliged** to **keep records** but **failed to do so** adequately. Without such records, the corporation was **unable to demonstrate** that it did not make such alleged wage payments to employees and therefore was unable to prove that the source deductions made were in excess of the required amount.

another reason to maintain clean records

4 Purchase/Sale of a Business

525(4)

INTERGENERATIONAL BUSINESS TRANSFERS (IBT) – AMALGAMATION WITHIN 60 MONTHS

IBTs conducted from **June 29, 2021 to December 31, 2023** are subject to the rules as modified by [Bill C-208](#) (see VTN [478\(6003\)](#) and [480\(6117\)](#)). We will refer to these as C-208 IBTs. Transactions as of January 1, 2024 are subject to the rules as modified by [Budget 2023](#) (see VTN [501\(7036\)](#)).

A December 11, 2024 French **Technical Interpretation** ([2024-1039101E5](#), Simon Lemieux) provided the reminder that **amalgamations** of corporations involved in a C-208 IBT within **60 months** of the transaction could **retroactively** result in **deemed dividends** to the vendor (former Paragraph 84.1(2)(e); see VTN [503\(7131\)](#)).

amalgamations within 60 months cause a loss of eligibility

5 Owner-Manager Remuneration

525(5)

PAYMENT TO SHAREHOLDER – SALARY OR DRAW?

A March 24, 2025 **Tax Court of Canada** case ([Malamute Contracting Inc. vs. HMK, 2020-2382\(IT\)G](#)) reviewed **whether** several **cheques** in 2018 and 2019 issued to the **two shareholders** of the corporation were **salary** or shareholder **draws**. CRA asserted that they were **salary** and assessed **penalties** on the basis that neither **income tax nor CPP** was **withheld** or remitted.

The payments at issue were made via biweekly cheque from January 2018 through February 2019. They were issued in **uneven amounts** (e.g. \$1,889.12) with the notation “**payroll**” on them. Payroll remittances were also made in January and February 2018.

Taxpayer wins

The Court found that the payments to the two shareholders were **not salary** (and that the **remittances** made in January and February were made in **error**) for the following reasons:

- **both shareholders** and the **accountant** were **credible** witnesses testifying that the owners **intended** to **receive dividend** payments, as the payment of salary could create cashflow issues due to required remittances;
- the shareholder who did the **bookkeeping** did **not** have **training** in this area and **used** the **term payroll** on the cheques simply to **distinguish payments** to the owners from those to others, rather than to indicate

how internal notes could be perceived by CRA

- the nature of the payment;
- the **financial statements** and **income tax returns** that were filed were **consistent** with the **taxpayer's position** that the amounts were **shareholder draws**; and
- the appeals agent did **not discuss** the **intent** of the payments **with the shareholders**.

The CRA **appeals officer** stated that the **accountant admitted** to some cheques being **payroll**, and as there was **nothing to distinguish** them from **other cheques**, the appeals officer found that all cheques were payroll. However, the Court noted that the **accountant's comment** "ok fine, maybe the ones in January can be called payroll, but not the whole year" was **not an admission** for the whole period but rather a concession to try and settle the file.

being careful about what is said and how that may be interpreted by CRA

DIRECTOR LIABILITY – REAL ESTATE TRANSACTION

In a March 21, 2025 **Tax Court of Canada** case ([Ayoub vs. HMK, 2020-1862\(GST\)G](#)), the sole **director** of a **homebuilding corporation** was assessed **personally** for the corporation's **failure to remit GST/HST** (Excise Tax Act Subsection 323(1)) in 2014 and 2015. The **GST/HST liability** arose in part due to the requirement to **self-assess GST/HST** on the fair market value of the property that the builder had begun leasing (Excise Tax Act Subsection 191(1)), with the remaining GST/HST liability arising on the **sale of three new homes** where GST/HST was collected but **not fully remitted**.

Taxpayer loses

The Court **rejected** the taxpayer's **argument** that the corporation did **not fail to remit GST/HST** as the corporation **never collected** such amount on the self-supply. It did not matter that GST/HST was never collected; the obligation to remit GST/HST on the FMV of the property still existed.

not collecting cash on self-assessment does not protect against director liability

The Court also observed that the taxpayer did **not consult his accountant or any other tax professional** when he decided to rent the property. Had the taxpayer been concerned with the payment of GST/HST, he would have consulted the relevant professional.

The Court also found that a **reasonably prudent person** who had **knowledge** of the corporation's **financial difficulties** would have **instructed** his **lawyer** to set aside **GST/HST in trust**. The Court found that the taxpayer's efforts were **focused on payments for materials and trades** as well as closing costs and mortgages, **rather than on remitting GST/HST**.

segregating GST/HST from operating funds

Finally, the Court found that the taxpayer's **significant financial contributions** to the corporation were to **cure the previous failures** to remit GST/HST **rather than to prevent the failure from happening**.

The Court found that the taxpayer was **not duly diligent** in preventing the failure from occurring and **upheld the director's liability assessment**.

6 Corporate Reorganization

525(6)

ESTATE FREEZE AND CORPORATE ATTRIBUTION

Where an **individual taxpayer transfers** or loans property **to a corporation, directly or indirectly** (through a trust or any other means), the **transferor** may be deemed to **receive annual income** (Subsection 74.4(2)) at the prescribed rate (Regulation 4301(c)) going forward (commonly referred to as "corporate attribution"). This deemed income can apply if **one of the main purposes** of the transfer or loan was to **reduce the individual's income** and to **benefit a designated person**, provided that no exceptions are applicable. See VTN [488\(6502\)](#) for more commentary.

whether a benefit was conferred on a designated person

A 2023 **Advance Tax Ruling** ([2022-0954211R3](#)) considered whether **corporate attribution** would apply in a **complex estate freeze** involving the transfer of corporate assets and trust reorganizations designed to **shift future growth** to a **new discretionary family trust**.

First, a **corporate reorganization** allowed a family trust ("First Trust") to **distribute** various **operating corporation shares** and notes to a parent (Parent 1) without triggering immediate tax. Second, an **estate freeze** was implemented whereby the First Trust exchanged its common shares in the holding company (Aco) for newly issued fixed-value preferred shares. New **growth shares** were **issued to a new discretionary trust** ("Second Trust"). The key consideration was whether a benefit would apply to the First Trust due to corporate attribution.

CRA determined that **corporate attribution would not apply** because **no person received or could receive a benefit** while being a **designated person**. This outcome was achieved by specific **restrictions** in the **Second Trust deed** that prevented minors (the Siblings) and Parent 2 (spouse of Parent 1) **from accessing income or capital** while they were designated persons.

careful review and crafting of trust restrictions

7 Corporate Tax

525(7)

SPECIFIED CORPORATE INCOME (SCI) – REALTOR COMMISSIONS

Income is **not eligible** for the **small business deduction** (SBD) if earned (directly or indirectly, in any manner whatever) by a CCPC **from** another **private corporation** (Payerco) in which the **CCPC**, one of its **shareholders** or a **person who does not deal at arm's length** with the CCPC or with any one of its shareholders, holds an interest (direct or indirect) in Payerco (Clause 125(1)(a)(i)(B)). Some exceptions apply (see VTN [417\(2579\)](#)).

A January 23, 2025 **Technical Interpretation** ([2024-1030091E5](#), Ryan Wallace, CPA) reviewed the application of these restrictions in the **context of real estate commissions** under the following **example**:

- Mr. A owned **100%** of both **Aco** (a CCPC earning real estate commissions) and **Bco** (another private corporation);
- **Realtyco** was a **CCPC** that was **not associated** with Aco or Bco;
- **Bco** owned **25%** of **Realtyco**, with the other 75% held by **unrelated shareholders**;
- Aco **earned its commission** working under the **Realtyco** real estate **brokerage**;
- **Realtyco** **received the commissions** on real estate transactions, **retained** an agreed percentage and **remitted the net commissions** to Aco;
- **Aco** provided the **real estate services** to the persons who **paid the commissions** (real estate purchasers and sellers); and
- all or substantially all of **Aco's income** was derived from these **commissions** paid from Realtyco.

how common structures like this are in many industries

The person requesting the interpretation asserted that **Realtyco** was purely **administrative** in nature, handling **paperwork**, and that **Aco** did **not provide services** to **Realtyco** but rather **provided services** to the real estate **purchasers and sellers** directly.

Direct or indirect interest in Realtyco

CRA noted that **Aco, Bco and Mr. A** were all **related** and therefore did **not act at arm's length**. As such, the **requirement** for an **ownership interest** in **Realtyco** would be met so **income** received by **Aco** for **services provided** to **Realtyco** would be subject to the **SCI rules**. CRA specified that Mr. A, the shareholder of Aco, held an indirect interest in Realtyco through his ownership of Bco.

CRA opined that it was a **question of fact** whether **Aco** received revenues from **services provided to Realtyco** (subject to the SCI rules) or from **services to arm's length clients** purchasing or selling real estate (not subject to the SCI rules).

clear documentation of the legal relationships surrounding the provision of services

Editors' comment

CRA did not discuss the manner in which it would determine whether Aco's services were provided directly to real estate purchasers and sellers or as a supplier of services to Realtyco. Presumably, they would review the business relationships, including any written contracts between the parties, the manner in which commissions were invoiced on real estate contracts and the manner in which Realtyco and Aco reflected the transactions for GST/HST purposes.

CRA also did not comment on whether, if Aco were legally receiving 100% of the commissions, from which it paid fees to Realtyco for its services, Realtyco would potentially be subject to the SCI rules in respect of those fees, as Mr. A was both a direct shareholder of Aco and an indirect shareholder of Realtyco.

In addition, CRA did not address the possibility that if Aco were providing its services to Realtyco, the arrangement might be a personal services business, with more punitive tax consequences (see VTN [516\(7790\)](#)).

8 CRA

525(8)

TRANSITION TO DIGITAL MAIL FOR BUSINESSES

A March 18, 2025 CPA Canada article ([How CRA's digital mail shift may cost businesses](#), Ryan Minor) discussed the transition of **business correspondence** to **online mail** that will commence in **spring 2025** (see VTN [520\(7931\)](#)).

previously announced transition to online mail is imminent

The article provided **several issues** that should be considered as **practitioners prepare** for this change.

Opting out

Impacted businesses can **opt out** of the **online-only correspondence** and continue to receive paper mail by either:

- selecting **paper mail** as the delivery option in **My Business Account**, expected to be available in **May 2025**; or
- filling out and **mailing Form RC681** – Request to Activate Paper Mail for Business to the CRA, expected to be available **May 12, 2025**.

The late availability of these options will leave **little time** for **businesses to opt out** ahead of the transition.

Limited digital capabilities of certain taxpayers

Many taxpayers **require business numbers** for **very specific** and **limited purposes** and may **not** have the **ability to properly manage digital communication**. For example, relatives of disabled or elderly individuals who employ caregivers may need a business number solely to remit source deductions. Condominium corporations or other organizations largely run by volunteers may have limited access to computers.

Automatic transition based on representative access

Taxpayers whose **representatives** have **online access** through My Business Account will be **automatically transitioned**. However, representatives often have access for very specific reasons and are **not usually responsible** for accessing **regular CRA correspondence**. In addition, some representatives may not remove online access for former clients, resulting in some **taxpayers being transitioned** because of a **former representative's online access**.

cancelling access for former clients

Time-sensitive communication

Time-sensitive communication, such as a notice of assessment, sent only through online mail may present challenges for taxpayers who do not regularly monitor their online accounts. A **notice** or other communication in electronic format is **presumed sent** and **received** by the person on the **date CRA posts** it in the secure electronic account (Subsection 244(14.2)), making the date of posting the correspondence critical.

mail is presumed received when posted online

Need for my business account enrollment

Businesses **not** already signed up for **My Business Account** will need to **do so to avoid losing access** to important **CRA correspondence**. This additional step will increase the **risk of missed deadlines** and compliance issues.

requirement to sign up for My Business Account to avoid losing access

ASSESSING NEW PENALTIES IN COURT

In a March 4, 2025 **Tax Court of Canada** case ([Estate of the Late Paul Uppal vs. HMK, 2024-816\(IT\)G](#)), the Minister argued that **if** the already **assessed gross negligence penalties** (Subsection 163(2)) **failed**, the taxpayer should instead be **liable for penalties for failure to file Forms T1134 and T1135** (Subsections 162(7) and (10)).

The Court stated that it may dispose of an appeal by either **dismissing it** or **allowing it** and **vacating** the assessment, **varying** the assessment or **referring** the assessment back to the Minister for reconsideration and reassessment. However, it **cannot order** the Minister to **increase the amount of an assessment** or impose new penalties that were not part of the original assessment. Likewise, the Court **cannot order** the Minister to **reassess years or taxpayers** that are **not before the Court**.

Since the Minister had not originally assessed the T1134 and T1135 penalties, and they were not a lesser version of the assessed gross negligence penalties, the Court found that it was **plain and obvious** the argument could **not succeed**. As such, these portions of the Minister's Reply were **struck**.

Court cannot assess new penalties not already assessed by Minister

REPEATED FAILURE TO REPORT INCOME – RETURNS FILED CONCURRENTLY

Taxpayers who **fail to report income** equal to or **exceeding \$500** for a **second time** in a **four-year period** are subject to a **penalty** equal to the **lesser** of the following (Subsections 163(1) and (2); similar provincial penalties also apply):

- **10% of the unreported amount**; and
- **50% of the taxes payable** when the omission is corrected, considering the income, deductible expenses and credits such as EI and CPP premiums attributable to the unreported source deductions.

A December 30, 2024 **Technical Interpretation** ([2024-103212117](#), Simon Morin) considered how the penalty would apply where **several tax returns** were **filed concurrently** where more than one did **not report at least \$500** of income.

CRA referred to a previous Court case (see VTN [420\(2811\)](#)) that found that the **penalty is applicable** even if the **multiple returns were filed concurrently**. The Court noted that the penalty does not refer to when the returns were filed, but rather the year to which they relate.

the years to which the returns relate

CRA provided an example where **tax returns** for **2001, 2002 and 2003** were all filed **concurrently** in 2004 and where **each tax return missed reporting** at least \$500 of **income**. The **penalty** would be applicable in respect of the **2002 and 2003 years**, assuming not more than \$500 of income was missing in any of the years from 1998 through 2000. If the taxpayer failed to report at least \$500 of income in at least one year in 1998 through 2000, the penalty would be applicable in respect of the 2001 through 2003 years. CRA also assumed that gross negligence penalties did not apply; if they did apply, the repeated failure to report income penalty would not.

JOINT AND SEVERAL LIABILITY – CHALLENGING THE UNDERLYING ASSESSMENT

Where a person who owes taxes **transfers property** to a current or future spouse (or common-law partner), a minor (under age 18) or a **non-arm's length person**, the recipient can become jointly and severally **liable** for the transferor's **tax debts** (Section 160). This liability is limited to the **excess** of the fair market **value** (FMV) of the property received over the **consideration provided** for the property.

In a March 14, 2025 **Federal Court of Appeal** (FCA) case ([HMK vs. Csak, A-66-24](#)), the taxpayer **received real property** from her **spouse** in **1993** at a time when her spouse had **unpaid tax and interest** owing for **1988 through 1991**. The reassessments for both 1988 and 1989 were issued on April 21, 1994, which was after the end of the normal reassessment period. The spouse **died** in **2002**. In **2012**, the taxpayer was assessed with **joint and several liability** (Subsection 160(1)) in respect of her late husband's tax liability.

death of a spouse does not protect against Section 160 if property is transferred prior to death

While **waivers** for **1988 and 1989 had been filed**, the **Tax Court of Canada** (TCC; [Csak vs HMK, 2015-3607\(IT\)G](#)) found **insufficient evidence** that the 1988 waiver had been **timely filed** and concluded that the 1989 waiver had been filed one day late, making both reassessments **statute-barred**. As such, there was **no underlying liability** for which the taxpayer was jointly and severally liable.

In the FCA, the Minister did not dispute the TCC's conclusion on the lack of evidence for the 1988 waiver. However, the Minister argued that the **waiver** for **1989** was **timely filed** and therefore the **reassessment** issued after the end of the normal reassessment period was **valid**.

Taxpayer wins and loses

The FCA stated first that the taxpayer is **not prevented** from **raising** the **statute-barred issue** in respect of the **underlying assessments**.

ability to challenge the underlying assessment

The FCA noted that, as there was **insufficient evidence** that the **1988 waiver was timely filed** and the reassessment was issued after the end of the normal reassessment period, the 1988 year was **statute-barred**.

For the **1989 year**, the **waiver** was **filed** on **Monday**, May 31, 1993, even though the **deadline** was on **Sunday**, May 30, 1993.

Where the **time limited** for the doing of a thing **expires** or **falls** on a **holiday**, the thing may be **done** on the **next day** that is not a holiday (Section 26 of the Interpretation Act). **Sunday** is a **holiday** for these purposes (Subsection 25(1) of the Interpretation Act). The Court ruled that these provisions **applied** to the **filing** of a **waiver**, and as such, the waiver filed on **Monday, May 31, was valid**. As it was valid, the **reassessment** beyond the normal

filing waivers the next business day is allowed if the deadline falls on a holiday

reassessment was also **valid**.

The **FCA overturned the TCC decision**, finding that the taxpayer was jointly liable for her deceased husband's tax debt.

Editors' comment

The fact that the taxpayer's spouse died before the joint and several liability assessment did not prohibit the Minister from assessing the taxpayer since, at the time of the transfer, she was related to her spouse, who had a tax liability at the time of the transfer.

In contrast, a recent court case (see VTN [523\(8127\)](#)) found that a taxpayer was no longer considered a spouse after their partner's death, preventing Section 160 from applying in respect of the transfer of assets outside the estate following the individual's passing. In this case, the surviving spouse was the designated beneficiary of the deceased's RRSP.

9 Estate Planning

525(9)

TRUST REPORTING – CRA GUIDANCE UPDATE

Expanded reporting rules apply to **trusts** with taxation years that end after December 30, 2023 (see VTN [504\(7240\)](#) and [496\(6821\)](#)). On March 14, 2025, CRA updated their FAQ [webpage](#) on trust reporting (retitled to **Enhanced reporting rules for trusts** and bare trusts: Frequently asked questions) adding and updating **questions and answers** regarding the requirements effective for trust year-ends on or after December 31, 2023. A further update was made on April 2, 2025, with minor changes. See VTN [509\(7454\)](#) for a discussion of the earlier webpage content.

CRA provided limited updates regarding bare trusts, likely due to the uncertainty of any filing obligations for 2025 and later years. The updated FAQ did not address the draft legislation released for consultation on August 12, 2024 proposing to modify the requirements for bare trusts commencing for the 2025 tax year (see VTN [517\(7837\)](#)).

Trust legal principles

CRA added a **general discussion** of the **non-tax legal principles** that apply to trusts in Canada, summarizing both **common law rules** applicable outside Quebec and **civil law** rules in Quebec ([FAQ 1.1](#)). CRA noted that, beyond this general overview, they **cannot** provide **legal advice** on the nature of any **specific arrangement** ([FAQ 1.2](#)).

this general guidance on trust law

Schedule 15 disclosure

In respect of the **identification of beneficiaries** on [Schedule 15](#), CRA indicated that trustees should **retain documentation** of their **efforts** taken to

obtain the **information** required to be disclosed for **specific beneficiaries** and in respect of **unknown beneficiaries** (FAQ 1.6). CRA also noted that there are **no relieving provisions** related to **other reportable entities** such as settlors and trustees (FAQ 1.7).

Where **errors or omissions** are discovered, CRA indicated that an **amended return** or **T3-ADJ T3 Adjustment Request** should be filed as soon as possible (FAQ 1.10).

filing an adjustment where Schedule 15 disclosure was incomplete or inaccurate

Listed trusts

Certain trusts, referred to as **listed trusts**, are **not required** to file **Schedule 15** and are eligible for broader exceptions from filing at all (FAQ 2.3).

Trusts that cease to exist

A trust that was **in existence** for **less than three months** at the end of the taxation year is a listed trust. CRA indicated that this would include both of the following (FAQ 2.5):

- a trust that was **created less than three months before** the **end** of the **taxation year**; and
- a trust that **ceased to exist** at a date that was **less than three months** after its creation.

short-term trusts can be listed trusts

Editors' comment

This resolved a question arising due to CRA's interpretation that most trusts, including bare trusts, have a taxation year-end of December 31, even if they cease to exist in the year prior to that date (see VTN 516(7800)).

Investment trust examples

One form of listed trust is a trust that holds **assets** with a total **fair market value** (FMV) that **does not exceed \$50,000** throughout the year, if the **only assets** held by the trust throughout the year are one or more of the following (referred to below as prescribed assets):

- i. money (note that money does not include collectible gold or silver coins, or gold or silver bars);
- ii. a debt obligation described in Paragraph (a) of the definition "fully exempt interest" in subsection 212(3);
- iii. a share, debt obligation, or right listed on a designated stock exchange;
- iv. a share of the capital stock of a mutual fund corporation;
- v. a unit of a mutual fund trust;
- vi. an interest in a related segregated fund (within the meaning assigned by Paragraph 138.1(1)(a); and
- vii. an interest, as a beneficiary under a trust, all of the units of which are listed on a designated stock exchange.

this limited list of assets

CRA provided several **examples** of trusts that either **meet** or **do not meet** these requirements, highlighting issues including the following (FAQ 2.7):

- if the **FMV of trust assets** exceeds \$50,000 at **any time** in the year, however briefly, it does not meet these requirements for that year;
- a **guaranteed investment certificate** is **not a prescribed asset**, and would cause the trust to fail to meet these requirements;
- some **foreign securities** are **prescribed assets**, as some foreign stock exchanges are designated (e.g. the New York stock exchange);
- shares of a **private corporation** are **not prescribed assets** and would cause the trust not to meet these requirements; and
- **real property** such as a cottage is **not a prescribed asset** and would cause the trust not to meet these requirements.

the need to ensure each asset held during the year is an eligible investment

While CRA's examples did not **specifically address** dividends receivable, each example that **met the requirements** stated that **no dividends** were declared or paid to the trust during the year, consistent with their previous statement that **dividends receivable** are **not prescribed assets** (see VTN [507\(7365\)](#)).

Bare trusts

CRA noted that, while they have **waived filings** for **bare trusts** for 2023 and 2024, they may be **filed voluntarily** ([FAQ 3.5](#)). CRA confirmed that they **will not** issue reminder notices for filings for **bare trusts** for the 2024 tax year ([FAQ 3.7](#)).

no reminder letters expected for 2024 if a bare trust filed in 2023

Where a bare trust with a **trust account number** has **ceased to exist** in 2023 or 2024, the account number can be **closed** by **filing a final T3 return** for the bare trust or **sending a letter** to CRA (either the Sudbury or Winnipeg Tax Centre) that includes the trust account number, bare trust name, the fact that the bare trust has ceased to exist, and the date on which the bare trust ceased to exist ([FAQ 3.6](#)).

10 Charities/NPOs

525(10)

TAX SHELTER – DONATIVE INTENT

A March 10, 2025 **Tax Court of Canada** case ([Ayre et al. vs. HMK, 2017-2985\(IT\)G](#)) considered whether the taxpayer had **donative intent** necessary to permit **charitable donation claims** (Section 118.1) made through **tax shelter** gifting arrangements (Section 237.1) for the 2009 to 2012 taxation years. The taxpayer's appeal was one of six lead cases tried on common evidence involving charitable donation tax credits claimed through tax shelter programs operated by **Relief Lending Group Inc.** (RLG) and **MissionLife Financial Inc.** (MLF). These gifting arrangements were purported to facilitate in-kind **donations of pharmaceuticals** to registered charities in exchange for inflated tax receipts. The appeal was grouped with 99 other appellants who agreed to be bound by the outcome.

Taxpayers lose

First, despite the programs indicating that large loans were used (to buy pharmaceuticals), the Court concluded that **no real lending occurred**. The “loans” were fictitious and participants simply **used their own cash** (disguised as prepaid interest) to **purchase pharmaceuticals**. This finding was based on the absence of credit checks, implausible loan amounts and lack of lender enforcement.

Second, the Court found that the fair market value (**FMV**) of the **donated pharmaceuticals** was **no more** than what the **participants actually paid**. This conclusion was supported by testimony from both expert witnesses (including those called by the taxpayers), who agreed that **actual transaction prices** in the relevant market are the best indicator of FMV.

In respect of **donative intent**, the Court found that the **taxpayers expected** to **financially benefit** from participating in the programs. Despite their testimony emphasizing **altruism**, the Court rejected it as **not credible**. The programs were marketed as “**profitable giving**,” offering tax credits in excess of the actual outlay. Participants sought to avoid tax, not support charity for its own sake. This pursuit of enrichment contradicted the legal requirement that a donor intend to impoverish themselves by making a gift.

whether expected benefit outweighed the cash donation

The Court upheld CRA’s assessments, holding that the taxpayers did **not possess the required donative intent**.

whether there was donative intent

Another case

In a March 27, 2025 **Tax Court of Canada** case ([Malone vs. HMQ, 2024-96\(IT\)](#)), the Court similarly found that the taxpayer did **not have donative intent** to make a charitable gift for his participation in the **Global Learning and Gifting Initiative**. For more information on that tax shelter, see VTN [464\(5196\)](#).

TAX SHELTER – INTEREST RELIEF

A March 5, 2025 **Federal Court** case ([McMillan vs. AGC, T-2240-24](#)) reviewed the taxpayer's application for **judicial review** of CRA's **refusal** to grant **taxpayer relief** from **interest**. The taxpayer had claimed a \$41,615 **charitable tax credit** in 2005 for a donation to the **Canadian Humanitarian Trust** (later found to be a tax shelter). In 2008, CRA reassessed her 2005 return and disallowed the entire claim. Her objection was held in abeyance due to related pending court decisions.

In **2015**, CRA reassessed to allow the cash portion of the donation and then offered the taxpayer **two options: waive objection rights** and CRA would **cancel interest** related to the in-kind donation **or proceed with her objection** and interest would continue to accrue. The taxpayer did **not respond**. In 2021, the pending cases were finalized, with the **in-kind donation** being found to **not be eligible**. In 2022, **CRA resumed its review**

watching out for settlement offers from CRA

and disallowed the in-kind portion of her donation while waiving some interest (from 2012 to 2015) related to administrative delays and financial hardship. The taxpayer subsequently sought judicial review of CRA's second-level decision denying full relief.

Taxpayer loses

The Court found that **CRA's decision was reasonable** and **procedurally fair**, noting that **reliance on a spouse** or the **complexity** of a tax shelter does **not** amount to an **extraordinary circumstance**. The **responsibility** rests with the **taxpayer** and taxpayers are **expected to investigate** donation schemes.

taxpayers are expected to investigate donation schemes

Also, while the taxpayer cited a misleading 2005 phone call with a CRA agent, the Court agreed with CRA that **registration of a charity does not guarantee donation eligibility**. **Delays** due to the **large-scale and complex** nature of the scheme were justified and CRA had respected reassessment timelines.

The Court also rejected the taxpayer's claims of lack of notice about the developments in respect of the shelter and related assessments, emphasizing that CRA maintained regular communication and that the **taxpayer was given opportunities** (e.g. the 2015 waiver offer) to **avoid** further **interest** accrual.

Editors' comment

Interest accumulated for well over a decade with very limited relief granted. Had CRA's offer in 2015 been accepted, significant amounts of interest and years of uncertainty could have been avoided. However, this would also have required the taxpayer to waive their rights to object or appeal the underlying tax. The interest would also have been avoided if the taxpayer had paid the disputed amount of tax earlier.

11 Relationship Breakdown

525(11)

CHILD AND SPOUSAL SUPPORT – ORDER OF PAYMENTS

A March 10, 2025 **Tax Court of Canada** case ([Janfada vs. HMK, 2023-2277\(IT\)I](#)) reviewed whether a taxpayer who **failed to pay** his **former spouse** the **full child and spousal support** as required under the spousal/child support **agreement** could **deduct** any amount for spousal support. The agreement stipulated that the taxpayer pay his former spouse \$1,204/month (\$14,448 annually) as **child support** for the two children and \$1,227/month (\$14,724 annually) as **spousal support**. The taxpayer only **paid \$10,825 in 2020** and **\$11,196 in 2021** and deducted the full amount on the basis that it was spousal support.

reviewing the tax results where support payments are not made in full

The taxpayer argued that the **children did not live with his former spouse** during 2020 and 2021 and that he and his former spouse had entered into an **agreement to reduce the child support payments to zero**.

Taxpayer loses

The Court stated that the provision allowing a **deduction for spousal support** (Paragraph 60(b)) is **very specific**. Where a taxpayer is required to make both spousal and child support payments, the **payments are first deemed to be child support**, and then spousal support. As such, in the event that a payer **defaults**, the recipient **first** receives a **non-taxable amount** with **no deduction** available to the payer.

child support is deemed to be paid first

The Court found that even though the taxpayer was a **credible witness**, there was **no mechanism** within the agreement to **bring the payment of child support** to an **end**. The Court did **not accept** that the **alleged agreement** altered the required child support payments. As such, in the **absence** of a **written agreement** cancelling the child support payments, the child support amount continued to be **payable** for the years based on a strict application of the Income Tax Act. This was the result regardless of where the children lived, how the taxpayer and their former spouse characterized the payments and whether or not the former spouse sought to enforce the payment of child support.

no change in deductibility without an update/change to the agreement

The Court noted that it is **not** within its **jurisdiction** to determine **whether** the taxpayer **should** have continued to make **child support payments** to his former spouse, even after the children no longer resided with the former spouse.

12 International

525(12)

T1135 – MULTIPLE PENALTIES

In a February 6, 2025 **Tax Court of Canada** case ([Azmayesh-Fard vs. HMK, 2021-2336\(IT\)G](#)), the taxpayer **failed to report income** from his **bank account in Switzerland** from **1998 to 2013** and also failed to file **Form T1135** for any of those years. CRA assessed the taxpayer with the following penalties for several of the years:

- **gross negligence penalties** for the unreported income (Subsection 163(2)) – 50% of the tax attributable to the false statement or omission, with a minimum penalty of \$100;
- **penalties** for failing to file form **T1135** (Subsection 162(7)) – \$25 per day for up to 100 days (minimum \$100 and maximum **\$2,500**);
- additional **penalties** for **failing** to file form **T1135** knowingly or under circumstances amounting to **gross negligence**:

many layers of penalties assessed on the taxpayer

- Subsection 162(10) – \$500 per month for up to 24 months (maximum **\$12,000**), less any penalties already levied (effectively, the penalty replaces, and does not add to, the more common penalty for failing to file T1135); and
- Subsection 162(10.1) – **after 24 months**, the penalty is **5%** of the **cost of the foreign property**, less the T1135 penalties already levied (effectively, the penalty replaces, and does not add to, the above T1135 penalties).

additional penalties for gross negligence specific to T1135s

CRA also assessed the taxpayer **beyond** the **normal reassessment period** on the basis that the taxpayer made a misrepresentation attributable to neglect, carelessness, wilful default or fraud (Subparagraph 152(4)(a)(i)).

For each of the years in question, the taxpayer's **accountant prepared** his **tax return** based on **information provided** by the taxpayer. The taxpayer did **not disclose** the existence of his **Swiss bank account** to his accountant **nor discuss ownership** of any **foreign property** with his accountant. The taxpayer **signed the returns annually without reviewing them**. More specifically, the taxpayer did **not review the question** about owning or **holding foreign property**. The taxpayer argued that the sole purpose of his offshore bank account was to hide funds from his spouse and not to deceive CRA.

Taxpayer loses

The Court found that the taxpayer was either **wilfully blind** or **grossly negligent** and was subject to **gross negligence penalties**. As the **additional penalties** for failing to file T1135s rely on the taxpayer **similarly failing to file** “**knowingly** or under circumstances amounting to **gross negligence**,” the Court also upheld the additional penalties. In coming to this conclusion, the Court noted the following:

similar analysis for multiple gross negligence penalties

- the taxpayer was an **experienced engineer** with both considerable international experience and **business** experience generally;
- the reassessments **increased taxable income by** an average of about **63%**, which the Court noted was **significant** in relation to the reported income;
- as the taxpayer **knew** he held **foreign property** with a total cost of greater than \$100,000, **a cursory reading** of the question on the personal tax return would have **highlighted** the issue even if he was genuinely under the mistaken belief that Canada did not tax income from foreign property;
- the concept that a Canadian resident is taxable on their worldwide income is a foundational concept and **not complex**; and
- the taxpayer made **no inquiries** related to the tax implications of ownership of foreign assets through his **accountant, CRA or any other third party**.

failing to ask questions is not helpful

Given the circumstances and the taxpayer's experience, the Court indicated that his **failure to inquire** about the tax implications of the Swiss bank account **departed markedly from** the **due diligence**, and the lack of inquiries suggested that he did not want to know the answers.

The Court dismissed the taxpayer's argument that he should not be penalized because he **only intended to deceive his spouse** and **not to avoid** his income **tax** obligations. The **requirement** that the taxpayer meet his **income tax obligations** did not turn on any judgment of the morality of hiding funds from one's spouse.

CRA was permitted to **assess beyond the normal reassessment period**. The penalties for **failing to file form T1135** were also **upheld**.

The Court ruling did not discuss how CRA was made aware of the taxpayer's failure to report foreign income and file T1135s.

While the Court did not disclose the **total** amount or calculation of the **penalties assessed**, they were likely **significant**. For example, the penalty for failing to file the T1135 due to gross negligence was assessed for seven years. Although the actual cost of the foreign property was not disclosed in the ruling, if the original contribution of approximately \$431,000 represented the full cost, the 5% penalty would amount to **35% of the cost of the asset** (5% per year over seven years), so these penalties would total **over \$150,000**, before considering penalties for the other nine years and interest charges. The bill would likely consume a significant portion of the original \$431,000 contribution to the foreign bank account.

ARIZONA PARTNERSHIPS

A March 28, 2025 **Technical Interpretation** ([2024-1014251I7](#), Vicky Liu) determined that a **limited partnership** created under **Arizona law** should be **classified as partnership** for Canadian income tax purposes. Although Arizona law provides that a partnership is an **entity distinct from its partners** – a feature resembling a corporation – CRA emphasized that separate legal personality **does not**, on its own, **necessitate corporate classification**. See VTN [516\(7811\)](#) for an explanation of CRA's process for classifying foreign entities.

the type of Canadian entity that the characteristics of the foreign entity most closely resemble

FOREIGN LIFE INSURANCE POLICIES

In a January 27, 2025 **Technical Interpretation** ([2024-1018491E5](#), Karri Lea Estabrooks), CRA was asked about an individual who received a lump-sum payment from a **UK endowment policy** that they had **acquired prior to becoming a resident** of Canada. While CRA declined to provide a definitive response, they offered several **general comments**.

Becoming a resident of Canada

When an **individual becomes a resident** of Canada, the individual is **deemed** to have **disposed of and reacquired each property** they owned immediately before becoming a resident for proceeds of disposition equal to the **fair market value** of the particular property (Paragraphs 128.1(1)(b) and (c)). CRA noted that this deemed disposition and reacquisition does not generally apply to a taxpayer's interest in a "life insurance policy in Canada," which is defined as a life insurance policy issued or effected by an insurer upon the life of a person resident in Canada at the time the policy was issued or effected (Subsection 138(12)).

ability to step up the cost of the foreign life insurance policy to FMV when becoming a resident of Canada

Annual income accrual

When a taxpayer holds an **interest** in a **life insurance policy** last acquired after 1989, the taxpayer must report **accrued income** relevant to the policy **annually** (Subsection 12.2(1)) **unless** it is an "**exempt policy**" (defined in Regulations Section 306). Broadly, an **exempt policy** is primarily designed to fund a **death benefit** rather than one designed to be an investment and savings vehicle. CRA confirmed that a life insurance policy issued by a **non-resident insurer** is **not specifically precluded** from qualifying as an exempt policy. That said, determining whether a policy is exempt requires actuarial calculations and information that only the issuing insurer will possess.

challenges in determining whether a foreign policy is exempt or not

Maturity and policy gains

A **payment** resulting from the **death** of the insured person under a **life insurance policy** (other than an annuity contract) that is an **exempt policy** is not a disposition and results in a **tax-free payment**.

Payments received on the policy during the **insured's lifetime** (for example, a benefit received on the maturity of the policy) result in a **disposition** of the policyholder's **interest** (Subsection 148(9)). The **policy gain** from this disposition is computed as the excess of the proceeds of the disposition over the policyholder's adjusted cost basis of that interest immediately before the disposition and is **fully included** in the taxpayer's **income** (Subsection 148(1)). As above, the amounts that are used to compute any policy gain may only be available from the issuer. While these amounts are normally easily obtained from a Canadian insurer, they may not be readily available from a foreign issuer who may be unfamiliar with Canadian tax law.

Form T1135

CRA stated that a taxpayer's interest in a foreign life insurance policy could constitute a "**specified foreign property**," triggering a Form T1135 filing requirement where the total cost at any time of the year exceeds \$100,000.

asking about foreign life insurance policies for T1135 purposes

13 First Nations

525(13)

DISCLOSURE FILINGS – EXEMPT INCOME

A December 30, 2024 French **Technical Interpretation** ([2024-1031721I7](#), Simon Morin) indicated that a **status Indian** whose **income** was fully **exempt from tax** (Paragraph 81(1)(a) of the Income Tax Act and Paragraph 87(1)(b) of the Indian Act) would still be required to file **disclosure forms** such as **Form T1134, Information Return Relating To Controlled and Non-Controlled Foreign Affiliates**, and **Form T1135, Foreign Income Verification Statement**. The standard **penalties** would apply where such disclosures are **filed late or not filed**.

T1135 required even where all income is tax-exempt

ADDITIONS TO RESERVES

A January 14, 2025 **Technical Interpretation** ([2024-1040541E5](#), Phyllis Chiu) discussed whether **lands** going through the **Additions to Reserve** process (ATR lands) were situated **on a reserve** such that **income connected** to such land could be eligible for **exemption from tax** (Paragraph 81(1)(a) of the Income Tax Act and Paragraph 87(1)(b) of the Indian Act) when received by a **status Indian**.

CRA reviewed the **definition** of a **reserve** (Indian Act Subsection 2(1)) and concluded that **ATR lands** would **not meet the definition** prior to the issuance of a **ministerial order** officially designating the land as a reserve. As a result, income connected to the ATR lands would **not be exempt**.

the definition of a reserve

14 GST/HST

525(14)

NEW HOUSING REBATE – JOINTLY OWNED PROPERTY

A March 25, 2025 **Tax Court of Canada** case ([Ram vs. HMK, 2024-1175\(GST\)I](#)) reviewed a reassessment denying the **GST/HST new housing rebate**. The Court noted that the facts of the case had the hallmarks of a **house flip**. The **taxpayer** had **agreed** that the **conditions required** for the **rebate** were **not met**; however, she raised the following **three issues**:

- her **liability** should be **limited** to the **50% of the rebate** she benefited from as she had **acquired** the property **jointly** with a friend who had signed the rebate application, assigning the rebate to the builder;
- **no interest** should apply as the **reassessment** and other correspondence was sent to the **property address**, not her **personal mailing address** on file with CRA, allowing **interest to accrue** for **several years** during which she was not aware of the liability; and

- the **reassessment** was **statute-barred** on the basis that the **original reassessment** was **not received** due to being sent to an **incorrect address**, with nothing sent to the **correct address within** the statutory **limitation period**.

She had **repaid half** of the rebate, with **no interest**, based on the first two arguments.

The Court first undertook a **detailed analysis** of the requirements for the GST new housing rebate and the related Ontario rebate, including the assignment of such rebates to a builder.

this resource for a review of these technical provisions

Taxpayer loses – liable for entire rebate

Where a **residential complex** is supplied to **more than one individual**, only a **single claimant** may **apply** for the **rebate** (Excise Tax Act Subsection 262(3)). Although the evidence was **clear** that she had **acquired a 50% interest**, it was equally clear that she was the **claimant of the rebate**. The **claimant is fully liable** for the **repayment** of the **rebate** where the **conditions for eligibility** are **not satisfied**. The taxpayer's **recourse** for the **co-owner's share** of the **rebate** was to **sue the co-owner**. Although the taxpayer claimed that the application had been made without her knowledge and consent, the Court concluded that she was aware of the claim, based on the evidence presented.

The Court also noted that the taxpayer's claim that a **partnership** of herself and the co-owner would have been **ineligible** for the **rebate**, and **each partner** would have been **jointly and severally liable** if a **partnership** received a claim. As such, even if the Court accepted the existence of a partnership, the taxpayer would still have been liable for the full reassessment.

only the claimant is liable for repayment of the rebate, even if there were co-owners

Taxpayer loses – interest payable

Any **waiver of interest** would have to be granted by **CRA** at their **discretion** under the **taxpayer relief** provisions. The Court suggested the taxpayer consider such an application but explicitly declined to express any view on the merits of same.

Taxpayer loses – not statute-barred

The Court noted that this issue was **first raised** during **closing argument**, although it related to her arguments in respect of the interest charges, raised in the proper course of the appeal. The Court stated that an **assessment is deemed received** when it is **mailed** (Excise Tax Act Subsection 334(1)) to the **correct address**. The Court noted that there was **no requirement** that the **same mailing address** apply for both **income tax** and **GST/HST** purposes, providing the example of a sole proprietor who uses a business address for GST/HST and a personal address for income tax.

As CRA sent the **rebate reassessment** to the **same address** provided by the taxpayer on the **rebate application**, they had used the **correct address**. The Court further noted that the **application (Form GST190)** allows for a **mailing address different** from the **property address**, although the use of a different mailing address “would raise a red flag” due to the occupancy requirements to be eligible for the rebate. The Court noted that it was **reasonable** for CRA to believe that the **address** on the **rebate application** remained the correct address in the absence of any conflicting information. While other cases had ruled that it was **reasonable** for the **taxpayer** to believe they had **updated their address** for GST/HST mail (citing the Kirschke case in this regard; see VTN [454\(4661\)](#)), there were **no circumstances** in this case to make it **reasonable** for the **taxpayer** to believe that her **income tax** address was **linked** to her address for **GST/HST rebate** purposes.

updating addresses for both income tax and GST/HST purposes

The Court also noted that the **rebate application** included a **misrepresentation** in **stating** that the **taxpayer** and her co-owner **acquired** the property for use as their **primary place of residence**. **Reliance** on her **co-owner** was **neglectful or careless** such that the normal **limitation period** for reassessment did **not apply**. As a result, the reassessment would be valid even if the **original reassessment** had **not been received** due to being mailed to the **wrong address**. This conclusion relied on the Court’s earlier determination that the taxpayer was aware of the rebate claim.

NEW HOUSING REBATE – TIMING OF APPLICATION

A March 10, 2025 **Tax Court of Canada** case ([Morgan vs. HMK, 2024-550\(GST\)](#)) reviewed whether a **new housing rebate** application had been **filed on time**. Although only the Ontario HST rebate was relevant in this case, the **deadlines** for the **GST rebate application** are comparable, requiring filings by the **earliest** of the following dates (Excise Tax Act Subsection 256.2(3) for the GST rebate; Subsection 46(6) of the New Harmonized Value-added Tax System Regulations, No. 2 to the Excise Tax Act for the Ontario HST rebate):

- i. **two years** after the property is **first occupied** (four years for the Ontario HST rebate);
- ii. **two years** after **ownership** is **transferred**; and
- iii. **two years** after **construction or substantial renovation** is **substantially completed**.

these filing deadlines for rebate applications

Later applications for both rebates can be accepted at **CRA’s discretion**. Only item (iii), the **date of substantial completion**, was **relevant** in this case.

The Court noted that both the **date of substantial completion** and the **date** that the **application** was **filed** were in dispute. The **taxpayer** argued that the date of **substantial completion** was **no earlier** than **January 25, 2020**.

filing these applications as early as possible to avoid challenge

CRA argued that this date was **January 13, 2020**. The **taxpayer** argued that the **filing date** was **December 31, 2021**. **CRA** argued that it was **no earlier** than **January 24, 2022**. If **either date** argued by the **taxpayer** was **correct**, then the **application** was **timely filed** within the two-year limit, even if **CRA** was correct in respect of the other date.

Taxpayer loses – date of substantial completion

a consistent story

The Court noted that **substantial completion** is **not defined** by legislation or regulation. **CRA's date** of January 13, 2020 was the date of **final inspection** by the **municipality** and had also been reflected in documents filed with the **taxpayer's notice of objection** to the denial of the rebate.

The Court noted that the **date argued** by the **taxpayer** would result in the **filing deadline** being exactly **one day after** the **date CRA argued** that the **application** had been **received**. The taxpayer argued that **gas and telephone services** were **not available** prior to January 25, that this was the date he and his spouse **moved back in** and **additional work** remained to be done as evidenced by **expenses documented** as incurred after January 13, 2020. The Court opined that **substantial completion** could occur **prior to utility connections** and prior to **occupancy**. The **subsequent work** was **not critical to occupancy**.

The Court found that the date of **substantial completion** was **January 13, 2020**, as argued by **CRA**.

Taxpayer wins – date of application

the weaknesses in CRA's tracking of the time of receiving mail

CRA established the **date of mailing** based on a **January 31, 2022 date stamp** reflecting **CRA receiving** the document on that date and a **CRA departmental policy** to treat **incoming mail** as being **mailed five business days prior to receipt**. The Court noted that **CRA policy** was **not evidence** of the actual **mailing date**. The Court further noted the **lack** of any **consideration** of the possibility that **date stamping** might be **delayed**, given the substantial volume of mail **CRA** would receive. The **CRA** witness testified that it was her **understanding** that where there was a **delay** between receipt and opening the mail, it would be **stamped** on the **date of receipt**. The Court expressed doubt that the **CRA litigation officer** possessed any **direct experience** in the **mailroom**. The Court was **not satisfied** that **CRA** had shown that the **date stamp** was the **actual date of receipt**.

The **taxpayer's accountant** testified that she was **well aware** of the **two-year deadline**, and she had **personally mailed** the **application** together with other mail on **December 31, 2021**. She provided **copies of receipts** showing **two packages mailed** by regular mail to two **CRA** addresses on that date, which she **retained on client files** to support recoverable disbursements as a firm policy.

consistent, documented firm mailing policies

The Court noted that although the **mailing date** was **not mentioned** in the **notice of objection**, this appeared to result from **neither the accountant nor the taxpayer** being aware of the **deeming rule** and believing they would

be required to prove the **date of receipt** by CRA.

The Court found that the date of **mailing** was **December 31, 2021** as argued by the taxpayer. Therefore, the **application** was **timely filed**.

Court comments

Although the above decided the case, the Court provided a lengthy **closing observation** including the following items:

- the taxpayer had undertaken the “**very activity** that the program was **intended to encourage**,” yet he was left with the **impression** that CRA was looking for **ways to disallow** his otherwise **valid claim**;
- CRA had **no direct evidence** of the **actual mailing date** other than the Canada Post **receipts** provided by the accountant, and the Court had “difficulty imagining what better evidence” could reasonably be expected;
- CRA’s **sweeping assumption** that it was **impossible** that Canada Post could take **more than five business days** to **deliver mail** between any two locations within Canada was, perhaps, a reasonable means of identifying situations where further evidence of the mailing date was required but was **not** appropriately **applied** as if it were a **statutory presumption**;
- the **twelve business days** between the January 13, 2022 due date and the January 31, 2022 date stamp was a **small margin**, especially considering a January 7, 2022 Government of Canada announcement regarding the exponential spread of the omicron strain of COVID-19 and the concurrent Canada Post press release advising of possible service delays;
- CRA has **discretion** to accept a **late application**, indicating that Parliament recognized that **accepting some late applications** was **necessary** to ensure that the **policy objectives** of the rebate could be **properly served**; and
- **no legislative guidance** existed on the circumstances where **CRA discretion** should be exercised in such matters; however, it is **well-established** by case law that CRA **cannot limit** the exercise of discretion to situations of **extraordinary circumstances** as described in various publications.

referring to this case in the event of a dispute with CRA over the time of mailing

raising public policy considerations in taxpayer relief applications

The Court finally suggested that it would have been **appropriate** for CRA to **alert the taxpayer** of the possible **application** for an **exercise of discretion** to **accept the application** even if it was late.

15 Did You Know...

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BRITISH COLUMBIA – CARBON TAX

On April 9, 2025, the [BC climate action legislation](#) webpage was updated to state that the **provincial carbon tax** was **eliminated** as of **April 1, 2025**. The BC climate action tax credit payment for April 2025 was the final payment.

no more BC carbon tax

BRITISH COLUMBIA – FOREIGN BUYERS TAX (FBT)

Several court cases have recently been released reviewing the **20% FBT** on foreign nationals, foreign corporations or taxable trustees on their proportionate share of the residential property's **fair market value of the property**, where the property is located within **specified areas of BC**.

Legal vs. beneficial ownership

An April 4, 2025 **Court of Appeal for British Columbia** case ([1084204 B.C. Ltd. vs. BC, 2025 BCCA 110](#)) found that the **liability** for the FBT is imposed at the **time** of the registration of the **transfer of legal title, without regard to beneficial ownership**.

change in legal title can trigger foreign buyers tax

The corporation was incorporated in BC, with its **sole shareholder** being neither a **Canadian citizen** nor a **permanent resident**. As such, the Court found that the corporation was a **foreign entity** and **liable** for the **tax**, even though it was not the true beneficial owner of the property. The beneficial owner was the shareholder's spouse, who was a Canadian citizen.

Beneficial owner indirectly controlled by foreign corporation

A March 7, 2025 **Court of Appeal for British Columbia** case ([1164708 B.C. Ltd. vs. BC, 2025 BCCA 76](#)) found that the corporation was subject to the FBT on the acquisition of a 38-unit apartment building in BC. The **corporation** held the residential property **in trust** for a corporate **beneficial owner**. All shares of these corporations were held by a **third corporation**. All **three corporations** were incorporated in **BC**. The **sole shareholder** of the third corporation was a corporation ("fourth corporation") **incorporated** under the laws of the **People's Republic of China**. Both shareholders of the fourth corporation had permanent resident status in Canada.

understanding the purchaser's legal structure

The Court found that the fourth corporation directly **controlled** its **subsidiary** and **indirectly** controlled the **appellant** and **beneficial owner** of the property. Because the fourth corporation was a **foreign corporation**, this made both the subsidiary and the appellant corporations foreign corporations despite the fact that they may have also been controlled by permanent residents of Canada. The \$6 million FBT was upheld.

whether a foreign person within the corporate chain controlled the purchaser

Constitutionality

A March 11, 2025 **Court of Appeal for British Columbia** case ([Bakhtiari vs. BC, 2025 BCCA 67](#)) found that the FBT was **not unconstitutional**. The ruling was consistent with the previous *Li vs. BC* case (see VTN [460\(4941\)](#)).

foreign buyers tax is not unconstitutional

ONTARIO – TARIFF RELIEF

On [April 7, 2025](#), the **Ontario government** announced several **measures** to support workers and businesses from the **impact of US tariffs**, as follows:

- **deferring** select **provincially administered tax payment deadlines** (e.g. employer health tax, insurance premium tax) for six months from April 1, 2025 to **October 1, 2025**; and
- issuing a further **\$2 billion rebate through WSIB** (Workplace Safety and Insurance Board) for safe employers.

relief for provincially administered tax deadlines

ONTARIO ESTATE INFORMATION RETURN (EIR) – FILE ONLINE

A March 7, 2025 All About Estates article ([Estate Information Return – The New Online Process](#), Betty Laidlaw) discussed the ability to file EIRs online using the Ministry of Finance's online services [webpage](#), as of March 3, 2025. While the PDF can still be printed and mailed in, it is no longer possible to submit the fillable PDF form online. The article provided several tips to assist with the new online process, as follows:

- Users can save a **draft** of the **EIR** but must ensure to **accurately** record the **access code**; users that record the wrong code will not be able to access the draft EIR (**no email** with the code will be sent). The confirmation code on the print view is not the access code.
- Users must **attach** the **Certificate of Appointment** when filing online, but it is not required when filing by mail, in-person or fax.
- The author noted that even though the [EIR Guide](#) states that the **trustee must certify** the EIR after reading the certification statement, there is **no form** or place for **this certification**.
- There is **no ability to print a complete copy** of the EIR. The “print view” option does not include all EIR sections or entered information. It is not possible to send a complete copy of the EIR to the client for review and approval.
- It is unclear if users that need to file an **amended form** should start from scratch and re-enter all information for online submission.

process for recording access code correctly

QUEBEC – RELIEF

On [April 4, 2025](#), the **Quebec government** announced that it would **mirror** the **federal relief** announced on March 21, 2025 (see VTN [524\(8142\)](#)) to **defer GST/HST remittances, corporate income tax payments and instalment payments** required to be paid during the period from April 2 to **June 30, 2025**. Revenu Québec (RQ) will **cancel any interest** calculated on an amount due during this period.

Quebec will mirror federal relief

RQ noted that businesses must continue to **file their returns** by the **usual deadlines** between April 2 and June 30, 2025 and that interest will resume as of July 1, 2025.

MANITOBA BUDGET

On March 20, 2025, the **Manitoba government** tabled its [2025 Budget](#). Some of the **proposals** included the following:

- **freezing indexation** of the basic personal amount and **tax bracket thresholds**, beginning in **2025**;
- increasing the **homeowners' affordability tax credit** to **\$1,600** (from \$1,500) in 2026;
- increasing the **maximum annual renters' affordability tax credit** to **\$625** (from \$575) and increasing the maximum seniors' top-up to \$357 (from \$328), for **2026**;
- doubling the **volunteer firefighting and volunteer search and rescue tax credit** to **\$6,000** (from \$3,000) in 2025;
- making the **cultural industries printing tax credit** permanent;
- aligning **eligibility timing** for the **seniors school tax rebate** with the homeowners' affordability tax credit;
- **excluding trusts** from eligibility for the **family tax benefit**;
- raising the **exemption threshold** to **\$2.5 million of annual remuneration** (from \$2.25 million) and raising the threshold below which businesses pay a reduced effective rate to \$5 million (\$4.5 million), effective January 1, 2026, for the **health and post-secondary education tax levy**;
- applying **retail sales tax (RST)** on **cloud computing services**, such as subscriptions to software, data storage and remote computer processing, effective January 1, 2026;
- implementing an **online service** to allow taxpayers to **verify** if a **business** is registered for **RST** in 2025; and
- considering **legislative changes** to **prevent the avoidance of land transfer tax** through use of legal structures in which legal and **beneficial ownership** of property are separated.

no indexation of tax brackets starting in 2025

increase in the threshold exemption from the health and post secondary education tax levy

NEW BRUNSWICK BUDGET

On March 18, 2025, the **New Brunswick government** tabled its [2025 Budget](#). There were no proposed changes to the personal or corporate tax rates.

no major tax changes

NEWFOUNDLAND AND LABRADOR BUDGET

On April 9, 2025, the **Newfoundland and Labrador government** tabled its [2025 Budget](#). There were no proposed changes to the personal or corporate tax rates.

no major tax changes

QUEBEC BUDGET

On March 25, 2025, the **Quebec government** tabled its [2025 Budget](#). There were no proposed personal or corporate tax rate changes. Some of the **proposals** included the following:

- lowering the age limit for an eligible child for the refundable credit for **child care expenses** to 14 (from 16), effective for the 2026 taxation year;
- converting the **clergy residence deduction** into a non-refundable tax credit for years after 2025;
- converting the deduction for **adult basic education tuition assistance** into a non-refundable tax credit for the 2026 taxation year;
- amending the term “practitioner” for **medical expense tax credit** purposes to **no longer include homeopaths, naturopaths, osteopaths and phytotherapists**, effective January 1, 2026;
- **eliminating various tax incentives**, including the following:
 - the tax shield and **tax credit** for **political party contributions**, effective in 2026;
 - tax holiday for foreign researchers, effective March 26, 2025; and
 - tax holiday for foreign experts, effective March 26, 2025.
- introducing **new criteria** for **designating educational institutions** recognized by Revenu Quebec requiring currently recognized institutions to complete a new form and renew its status by January 1, **2026** and then **renew** every **five years**. Individuals must also **certify** in their **tax returns** that they took the training to **acquire** or improve the **skills** required to practice a **profession**. Effective January 1, **2026**, the educational institutions must meet one of the following four criteria:
 - be an educational institution that receives government funding;
 - be a private educational institution that provides training equivalent to that provided in a public sector educational institution;
 - be a private educational institution that provides training for a profession or trade requiring certification or a licence issued by a

elimination of several tax incentives

- government authority; and
- be an educational institution that provides training leading to a professional status recognized by the Québec Professional Code.

Educational **institutions** that do **not** meet certain **requirements** related to the **health sector** will be **excluded**.

tighter rules for accessing tuition tax credit

- extending the **family allowance** payment to 12 months from the **death of a child**, effective for deaths occurring after June 30, 2025;
- introducing a new 20% (up to 30%, for a maximum of \$1 million in eligible expenditure) **refundable tax credit for research & development** (R&D), innovation and pre-commercialization (CRIC) that would replace various credits (e.g. tax credit for salaries (R&D) and the R&D tax credit (research contract)), applicable to fiscal periods beginning after **March 25, 2025**;
- refocusing eligible activities for tax credits for developing e-businesses to focus on **integrating artificial intelligence**, for tax years beginning after December 31, 2025;
- refocusing of the **tax credit** related to resources on **critical and strategic minerals**, applicable to eligible expenses incurred on or after March 26, 2025;
- introducing a **new reporting requirement** (new prescribed form; parallel to the Federal Form T1135) for Quebec taxpayers in respect of **foreign property held outside of Canada**, with an effective date to be determined; and
- introducing an **annual fee for electric vehicles** and plug-in hybrid vehicles as of January 1, 2027.

Several of the **proposals** are a result of the **recently completed review of hundreds of tax expenditures** in Quebec.

SASKATCHEWAN BUDGET

On March 19, 2025, the **Saskatchewan government** tabled its **2025 Budget**. There were no proposed personal or corporate tax rate changes. Some of the **proposals** included the following:

- introducing a 50% refundable **fertility treatment tax credit** for one lifetime fertility treatment expense claim of up to \$20,000 per filer, effective January 1, 2025;
- extending the new **application** acceptance period for the **Saskatchewan commercial innovation incentive** to **June 30, 2027**, eliminating the new economic benefits to Saskatchewan test and reducing the scientific/technology test threshold;
- making the **PST rebate for new home construction a permanent program** (providing a rebate of up to 42% of the PST paid on the purchase of a new home with a total price of less than \$550,000 before taxes and excluding the value of the land, furnishings and appliances);

incentive for new home construction

- increasing the annual road use **charge** for **electric vehicles** to \$300 (from \$150), effective June 1, 2025; and
- introducing a new **small and medium enterprise investment tax credit** (non-refundable) of 45% of equity investments in Saskatchewan-based businesses with between five and 49 employees (half or more of which reside in Saskatchewan) that are in either the food and beverage manufacturing sector or machinery and transportation equipment manufacturing sector. There will be a minimum investment of \$50,000 for corporations and \$25,000 for individuals and a minimum three-year holding period.

The Budget reiterated several proposals announced on December 2, 2024 (see VTN [521\(7988\)](#)) relating to several **personal measures** and retaining the **1% small business** income rate **permanently**.

small business tax rate is not changing

NEW ONLINE COURSE – DEMYSTIFYING AI FOR ACCOUNTANTS: RISKS, REWARDS AND ETHICS

Artificial Intelligence (AI) is rapidly **transforming** the tax and accounting **industry**, and those who thoughtfully adopt it are already reporting **benefits** – from time savings and more efficient data handling to enhanced client service. However, **concerns** around **data confidentiality**, **accuracy** and the **ethical use** of such technology remain **substantial**.

Join machine learning engineer and entrepreneur Greg Burlet, MSc, MA and Caitlin Butler, CPA, for a **new** 1-hour **online course**: **[Demystifying AI for Accountants: Risk, Rewards and Ethics](#)**. The course is built specifically for firms like yours that want to **adopt AI thoughtfully and responsibly**, without compromising on professional standards.

understanding AI risks to thoughtfully leverage technology

This course will walk you through **core ethical considerations** and **risks** of using large language models like **ChatGPT**, covering key themes such as “trust but verify,” input quality, algorithm transparency and balancing innovation with regulatory obligations. Whether you are just getting started or looking to make smarter choices, this course offers the guidance you need to **move forward with confidence**.

MONTHLY TAX UPDATE PODCAST – BETA TEST

Video Tax News is exploring a **new format** for the Monthly Tax Update **newsletter**: a **1-hour podcast** developed to make it **easier** for **busy professionals** to stay informed while on the go.

This feature is still in development, and we are looking for a small group of **subscribers to help us test it**. Whether you are a seasoned podcast listener or are not sure if it is your thing, we would love your input. Your **feedback** will play a key role in **shaping this offering**.

If you've had an active subscription for at least the past 6 months, you are eligible to apply as a Beta tester. You'll get **early access**, provide **valuable feedback** and earn **monthly professional development (PD) credits**.

Spots are limited. [Click here](#) to sign up as a Podcast Beta Tester.

Thank you for being part of the Video Tax News community

16 Appendix

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APPENDIX A

CRA Guides/Publications

- [S3-F1-C1](#) Shareholder Loans and Debts
- [S3-F1-C2](#) Deemed Interest Benefit on Shareholder Loans and Debts
- [GI-201](#) Harmonized Sales Tax Newfoundland and Labrador New Residential Rental Property Rebate
- [UHTN2](#) Calculating the Underused Housing Tax Payable
- [UHTN3](#) Filing a Return and Paying the Underused Housing Tax
- [UHTN4](#) Exemptions for Specified Canadian Partnerships, Trusts and Corporations
- [UHTN5](#) Exemption for Vacation Properties
- [RC4060](#) Farming Income and the AgriStability and AgriInvest Programs Guide
- [RC4408](#) Farming Income and the AgriStability and AgriInvest Programs Harmonized Guide
- [NEWS119](#) Excise and GST/HST News – No. 119
- [T4012](#) T2 Corporation - Income Tax Guide 2024
- [T4068](#) Guide for the Partnership Information Return (T5013 Forms) - 2024
- [FCRATES](#) Fuel Charge Rates
- [GI-175](#) Public Service Bodies' Rebate for Charities Resident Only in Nova Scotia
- [GI-183](#) Public Service Bodies' Rebate for Qualifying Non- profit Organizations Resident Only in Nova Scotia
- [NOTICE343](#) Nova Scotia HST Rate Decrease – Questions and Answers on Transitional Rules for Housing and Other Real Property Situated in Nova Scotia
- [NOTICE342](#) Nova Scotia HST Rate Decrease – Questions and Answers on General Transitional Rules for Personal Property and Services
- [T4001](#) Employers' Guide - Payroll Deductions and Remittances
- [14-9-1](#) Partnerships - Determining the Existence of a Partnership
- [FCN16](#) Removal of the fuel charge
- [FCN15](#) Temporary relief of the fuel charge – Light fuel oil for use exclusively in eligible heating activities
- [FCN1](#) Registration Under the Greenhouse Gas Pollution Pricing Act
- [FCN2](#) Distributors Under the Greenhouse Gas Pollution Pricing Act
- [FCN3](#) Annual Charge on Fuel Held in a Listed Province on Adjustment Day
- [FCN4](#) Importers Under the Greenhouse Gas Pollution Pricing Act
- [FCN5](#) Emitters Under the Greenhouse Gas Pollution Pricing Act
- [FCN6](#) Road Carriers Under the Greenhouse Gas Pollution Pricing Act

- [FCN7](#) Users Under the Greenhouse Gas Pollution Pricing Act
- [FCN8](#) Air Carriers, Marine Carriers, Specified Air Carriers or Specified Marine Carriers Under the Greenhouse Gas Pollution Pricing Act
- [FCN9](#) Rail Carriers or Specified Rail Carriers Under the Greenhouse Gas Pollution Pricing Act
- [FCN10](#) Regulations Amending the Fuel Charge Regulations Made Under the Greenhouse Gas Pollution Pricing Act
- [FCN11](#) Marketable Natural Gas and Non-Marketable Natural Gas Distributed Through Pipelines
- [T4091](#) T5008 Guide - Return of Securities Transactions 2024

CRA Forms/Statements>Returns

- [GST60](#) GST/HST Return for Purchase of Real Property or Carbon Emission Allowances
- [RC7260](#) GST/HST and QST Return for Purchase of Real Property/Immovable or Carbon Emission Allowances by a Selected Listed Financial Institution
- [T3SCH15](#) Beneficial Ownership Information of a Trust
- [GST495](#) Rebate Application for Provincial Part of Harmonized Sales Tax (HST)
- [GST518](#) GST/HST Specially Equipped Motor Vehicle Rebate Application
- [RC7190-WS](#) GST190 Calculation Worksheet
- [RC381](#) Inter-Provincial Calculation for CPP and QPP Contributions and Overpayments
- [T1200](#) Actuarial Information Summary
- [RC723](#) Transfer from an FHSA to another FHSA, RRSP or RRIF on Breakdown of Marriage or Common-law Partnership
- [RC721](#) Transfer from your FHSA to your FHSA, RRSP or RRIF
- [T2054](#) Election for a Capital Dividend Under Subsection 83(2)
- [AUT-01](#) Authorize a Representative for Offline Access
- [AUT-01X](#) Cancel Authorization for a Representative
- [T2016](#) Part XIII Tax Return - Tax on Income from Canada of Approved Non-Resident Insurers
- [T2142](#) Part XII.3 Tax Return Tax on Investment Income of Life Insurers
- [RC532](#) Request for Administrative Review
- [5013-R](#) Income Tax and Benefit Return for Non-Residents and Deemed Residents of Canada
- [B200](#) Excise Tax Return
- [N15](#) Excise Tax Application for Refund



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